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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. No. CR12-0090 RS
Plaintiff,)
v.)
PABLO PEREZ-ANGUILANO,)
a/k/a Jose Escalera Aguilera,)
a/k/a Jose Escalera,)
a/k/a Mario Escalera,)
Defendant.)

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME UNDER 18 U.S.C. § 3161

21 On February 28, 2012, the parties in this case appeared before the Court. At that time, the
22 Court set the matter to March 27, 2012. The parties have agreed to exclude the period of time
23 between February 28, 2012 and March 27, 2012 from any time limits applicable under 18 U.S.C.
24 § 3161. The parties represented that granting the exclusion would allow the reasonable time
25 necessary for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
26 also agree that the ends of justice served by granting such an exclusion of time outweigh the best
27 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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STIPULATION & [PROPOSED] ORDER EXCLUDING TIME
CR 12-0090 RS

1 At the hearing, the Court made findings consistent with this agreement.
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3 SO STIPULATED:

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5 MELINDA HAAG
United States Attorney
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7 DATED: March 1, 2012

/s/
8 J. MARK KANG
Special Assistant United States Attorney
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10 DATED: March 1, 2012

/s/
11 SHAWN HALBERT
Attorney for PABLO PEREZ-ANGUIANO
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STIPULATION & [PROPOSED] ORDER EXCLUDING TIME
CR 12-0090 RS

1 [PROPOSED] ORDER

2 For the reasons stated above and at the February 28, 2012 hearing, the Court finds that the
3 exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from February 28,
4 2012 through March 27, 2012 is warranted and that the ends of justice served by the continuance
5 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C.
6 §3161(h)(7)(A). Denying the requested exclusion of time would deprive the parties of the
7 reasonable time necessary for effective preparation, taking into account the exercise of due
8 diligence. 18 U.S.C. §3161(h)(7)(B)(iv).

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10 IT IS SO ORDERED.

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12 DATED: 3/1/12

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THE HONORABLE RICHARD SEEBORG
United States District Judge

